

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

MIDWEST PILOTS MERGER COMMITTEE,

CARL SCHWERMANN, in his Capacity as
Chairperson of the MIDWEST PILOTS
MERGER COMMITTEE,

DONALD TILL, in his Individual Capacity and in
his Capacity as Vice Chairperson of the
MIDWEST PILOTS MERGER COMMITTEE,

Case No. 14-cv-01441-RTR

and

MARK E. WARD,

Plaintiffs,

-against-

FRONTIER AIRLINES, INC.,

and

FRONTIER AIRLINE PILOTS ASSOCIATION,

Defendants.

**DEFENDANT FRONTIER AIRLINES, INC.'S MEMORANDUM OF LAW
IN OPPOSITION TO PLAINTIFFS' MOTION FOR LEAVE TO AMEND
THEIR COMPLAINT TO SUBSTITUTE A PLAINTIFF**

For all of the reasons set forth in the Memorandum of Law of Defendant Frontier Airline Pilots Association in Opposition to Motion by Plaintiffs for Leave to Amend Their Complaint to Substitute a Plaintiff (Docket No. 29), which Frontier agrees with and incorporates by reference, Defendant Frontier Airlines, Inc. opposes the Motion by Plaintiffs for Leave to Amend Their Complaint to Substitute a Plaintiff (Docket No. 28).

Dated: March 18, 2015

Respectfully submitted,

/s/ Robert A. Siegel

Robert A. Siegel
O'MELVENY & MYERS LLP
400 South Hope Street
Los Angeles, California 90071
Telephone: (213) 430-6000
Facsimile: (213) 430-6407
E-mail: rsiegel@omm.com

Mark W. Robertson
O'MELVENY & MYERS LLP
Times Square Tower
7 Times Square
New York, New York 10036
Telephone: (212) 326-2000
Facsimile: (213) 326-2061
E-mail: mrobertson@omm.com

Jennifer L. Ciralsky (SBN 1068092)
LITTLER MENDELSON, P.C.
111 East Kilbourn Avenue, Suite 1000
Milwaukee, Wisconsin 53202-4108
Telephone: (414) 291-5536
Facsimile: (414) 291-5526
E-mail: jciralsky@littler.com

Attorneys for Frontier Airlines, Inc.